

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

*Plaintiff,*

*vs.*

Case No. 20-CR-26

YOUSSEF BARASNEH,

*Defendant.*

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**SECOND MOTION TO ENLARGE TIME  
TO FILE PRETRIAL MOTIONS**

Yousef Barasneh moves this Court to enlarge the due date for filing pretrial motions, currently scheduled for March 11, 2020. Undersigned counsel seeks a one-week extension. As grounds for this motion, undersigned counsel states the following:

1. At a telephonic scheduling conference on February 24, 2020, the Court granted Yousef Barasneh's motion to enlarge the time to file pretrial motions. Doc 17. The Court set a new date deadline of March 11, 2020 for filing pretrial motions.

2. Barasneh's counsel seeks one additional week to file any pretrial motions.

3. As the Court is aware, Chief Judge Pamela Pepper granted undersigned counsel's motion to adjourn the jury trial in a text-only order on February 24, 2020. That order calls for the parties to file a status report by the end of the day on April 17, 2020, notifying the court of their anticipated next steps. Should this Court grant this motion seeking an additional week to file motions, undersigned counsel would immediately ask Judge Pepper to reschedule the status report date from April 17 to April 24, 2020.

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4. While the government did turn over more discovery since the February 24, 2020 telephonic scheduling conference, and Barasneh anticipates more disclosures, it was not a significant amount, and it plays only a small role in this request. Counsel has been reviewing pleadings in similar cases as well as continuing to read the discovery in this case and work with Mr. Barasneh. That work slowed considerably in the last week due to work counsel did to complete a draft a filed a fairly lengthy and complicated sentencing memorandum in *US v. Dominique Bams*, 18-cr-227. That work consumed the majority of undersigned counsel's time in the last week. Counsel only filed that sentencing memorandum this evening. Additionally, undersigned counsel took time to prepare for and attend three change-of-plea hearings on Monday and Tuesday, March 9-10 (*US v. Maurice Tolbert*, *US v. Shaimone Barkhadle*, and *US v. Ricky Austin*); counsel filled in for a colleague in the district's re-entry court on March 4; counsel served as the "duty" attorney on March 5, sat in with a client during a lengthy presentence interview on March 6, and had office appointments with other clients on those three days.

5. Counsel believes that he can accomplish his review of the discovery, research and file any motions by March 18, 2020. Finally, undersigned counsel only late in the evening reached out to Assistant United States Attorney Benjamin Proctor. Should counsel learn of the government's position, he will promptly pass it along to the Court.

For these reasons, Yousef Barasneh respectfully asks this Court to enlarge the time to file pretrial motions by one week, which would be March 18, 2020.

Dated at Milwaukee, Wisconsin, this 11th day of March, 2020.

Respectfully submitted,

/s/ John W. Campion

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